

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

NATIONAL SALVAGE & SERVICE CORPORATION,	)	
	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 2022-1428-TMH
	)	
SULLA VALLEY BIOGAS, SA DE C.V. and HONDURAN GREEN POWER CORPORATION,	)	<b>JURY TRIAL DEMANDED</b>
	)	
	)	
Defendants.	)	

**AFFIDAVIT OF ATTORNEYS' FEES AND EXPENSES**

I, Christopher Fitzpatrick Cannataro, being first duly sworn upon my oath, depose and state that I am an adult over 18 years of age, have personal knowledge of and am competent to testify to the following facts:

1. I am an attorney licensed to practice law in the State of Delaware, and my firm, Abrams & Bayliss LLP ("A&B"), has been engaged to represent the Plaintiff, National Salvage & Service Corporation ("NSSC" or "Seller") in this action.

2. NSSC has incurred legal fees and costs in the amount of \$18,473.72 (A&B) in preparing its Complaint against Defendants, Sula Valley Biogas, SA DE C.V. ("Sula Valley") and Honduran Green Power Corporation ("HGPC" and together with Sula Valley, the "Buyer"); obtaining a default, and filing its Application for Default Judgment.

3. The breakdown of fees and costs provided by A&B are as follows:

TIMEKEEPER	HOURS	FEES
John M. Seaman	2.8	\$2,917.50
Matthew L. Miller	.1	\$70.00
Daniel J. McBride	.1	\$56.50
Christopher Fitzpatrick Cannataro	21.90	\$11,540.50
Clara E. Hubbard	2.0	\$790.00
Adriane L. DuPlessis	4.4	\$1,349.00
Tiffany N. Matthews	2.0	\$605.00
TOTALS	33.30	\$17,328.50

4. NSSC has also incurred costs of \$1,145.22 for filing this action.

5. In total, A&B has provided 33.30 hours of legal services to date, including but not limited to activities such as:

- a. Drafting the complaint; and
- b. Researching and drafting the application for default judgment and associated papers.

6. Based on the factors set forth in Rule 1.5 of the Delaware Lawyers' Rules of Professional conduct, it is my opinion that \$17,328.50 is a reasonable award of attorneys' fees incurred for the work A&B has performed in pursuing NSSC's claims against the Buyer.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on February 24, 2023

  
 Christopher F. Cannataro